

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MAVIS MASSENGALE,

Plaintiff,

v.

CHRYSLER CAPITAL, LLC,

Defendant.

CASE NO. 3:18- cv-00585-B

Hon. Jane J. Boyle

**JOINT MOTION TO STAY PROCEEDINGS PENDING ARBITRATION**

COME NOW jointly Plaintiff, Mavis Massengale (“Massengale”), and Defendant, Chrysler Capital, LLC (“Chrysler Capital”), pursuant to the Federal Arbitration Act, the Federal Rules of Civil Procedure, and this Court’s Local Rules, by and through their undersigned counsel, and file their Joint Motion to Stay Proceedings Pending Arbitration, stating as follows:

For the reasons more fully set forth in the accompanying Memorandum in Support of Joint Motion Joint Motion to Stay Proceedings Pending Arbitration, the parties have conferred and agree to submit this matter to binding arbitration. Consequently, Massengale and Chrysler Capital request a stay of these proceedings in the interim, including a suspension of all upcoming pretrial deadlines. The parties will notify the Court once the arbitration is complete.

WHEREFORE, based on the above and foregoing, the parties ask that this Court enter an Order staying this case pursuant to the Federal Arbitration Act during the pendency of the arbitration.

Dated: May \_18, 2018

Respectfully submitted,

/s/ Amy Elizabeth Clark

Amy Elizabeth Clark  
Amy Clark Law  
1601 Elm Street, 33rd Floor  
Dallas, TX 75201  
512-850-5290  
Fax: 626-737-6030  
Email: amy@amyclarklaw.com

*Counsel for Plaintiff  
Mavis Massengale*

/s/ Virginia Bell Flynn

Virginia Bell Flynn  
Texas Bar No. 24101258  
TROUTMAN SANDERS LLP  
4320 Fairfax Avenue  
Dallas, Texas 75205  
Telephone: 804.697.1480  
Facsimile: 804.698.5109  
Email: virginia.flynn@troutmansanders.com

*Counsel for Defendant  
Chrysler Capital, LLC.*

**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7.1(b), the undersigned counsel hereby certifies that there was a conference between the parties concerning the instant motion and its legal basis. The conference was held on May 18, 2018. An agreement was reached and parties concur that this matter should be stayed pending binding arbitration.

/s/ Amy Elizabeth Clark  
Amy Elizabeth Clark  
Amy Clark Law  
1601 Elm Street, 33rd Floor  
Dallas, TX 75201  
512-850-5290  
Fax: 626-737-6030  
Email: amy@amyclarklaw.com

*Counsel for Plaintiff  
Mavis Massengale*

/s/ Virginia Bell Flynn  
Virginia Bell Flynn  
Texas Bar No. 24101258  
TROUTMAN SANDERS LLP  
4320 Fairfax Avenue  
Dallas, Texas 75205  
Telephone: 804.697.1480  
Facsimile: 804.698.5109  
Email: virginia.flynn@troutmansanders.com

*Counsel for Defendant  
Chrysler Capital, LLC.*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MAVIS MASSENGALE,

Plaintiff,

v.

CHRYSLER CAPITAL, LLC,

Defendant.

CASE NO. 3:18- cv-00585-B

Hon. Jane J. Boyle

I hereby certify that on the \_\_\_\_ day of May, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sent a notification of such filing (NEF) to the following:

*Counsel for Plaintiff*  
Amy Elizabeth Clark  
Amy Clark Law  
1601 Elm Street, 33rd Floor  
Dallas, TX 75201  
512-850-5290  
Fax: 626-737-6030  
Email: amy@amyclarklaw.com

/s/ Virginia Bell Flynn  
Virginia Bell Flynn  
Texas Bar No. 24101258  
TROUTMAN SANDERS LLP  
4320 Fairfax Avenue  
Dallas, Texas 75205  
Telephone: 804.697.1480  
Facsimile: 804.698.5109  
virginia.flynn@troutmansanders.com

*Counsel for Defendant*  
*Chrysler Capital, LLC*